



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

August 23, 2024

BY EMAIL

The Honorable Ona T. Wang
United States Magistrate Judge
Southern District of New York
New York, New York 10007

Re: *United States v. Timy Hakim and Isaiah Okere, 21 Cr. 259 et al.*

Dear Judge Wang:

On April 19, 2021, a Grand Jury in this district returned superseding indictment "S2 21 Cr. 259," charging defendants Timy Hakim and Isaiah Okere with wire fraud conspiracy, in violation of 18 U.S.C. § 1349; wire fraud, in violation of 18 U.S.C. §§ 1343 and 2; money laundering conspiracy, in violation of 18 U.S.C. § 1956(h); and money laundering, in violation of 18 U.S.C. §§ 1956 and 2. The Grand Jury also charged Hakim and Okere with the same offenses individually via indictment ("21 Cr. 259") and superseding indictment ("S1 21 Cr. 259"), respectively. Mr. Hakim's prosecution was resolved through a guilty plea and sentencing. The S1 and S2 indictments were partially sealed pending Mr. Okere's apprehension and extradition. Mr. Okere has been extradited from South Africa and will be presented later today. Accordingly, the Government respectfully requests that the S1 and S2 indictments in this matter be fully unsealed.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/
Vladislav Vainberg
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Granted.

Aug 23, 2024